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7 *Attorney for Defendant*
8 *Pedro Montalvo*

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,

2:20-cr-00156-RFB-DJA

12 Plaintiff,

13 **UNOPPOSED MOTION TO**
14 **ALLOW TRAVEL**

15 vs.

16 ADALI ARNULFO ESCALANTE-
17 TRUJILLO, et al.,

18 Defendants.

19 Certification: This motion is timely filed.

20 Comes now the defendant, Pedro Montalvo, by and through his counsel
21 of record, William Brown, of BROWN MISHLER, PLLC, and hereby moves
22 this court for permission to travel to California on for medical treatment from
23 December 14-21, and 27-28, 2020, for a medical treatment, and various dates
24 for child visitation. This request is based on the Points and Authorities
25 attached hereto.

26 Dated: December 8, 2020

27 By /s/ William H. Brown
28 WILLIAM H. BROWN
Attorney for Pedro Montalvo

**MEMORANDUM OF
POINTS AND AUTHORITIES**

Defendant Pedro Montalvo's pretrial release conditions forbid out-of-state travel and Montalvo therefore seeks permission from the Court to travel to California for medical treatment on December 14-21, and December 27-28, 2020, and to California for court approved child visitation on the following dates:

1. December 18-21, 2020;
2. January 1-4, 2021;
3. January 15-8, 2021;
4. February 5-8, 2021;
5. February 19-22, 2021;
6. March 5-8, 2021;
7. March 19-22, 2021;
8. April 2-5; 2021;
9. April 16-19, 2021; and
10. April 30 - May 2, 2021.

The defense has communicated with Montalvo's Pretrial Services Officer, and the government, and neither opposes this request.

Dated: December 8, 2020

By /s/ William H. Brown
WILLIAM H. BROWN
Attorney for Pedro Montalvo

CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that he is an employee of BROWN MISHLER, PLLC, and is a person of such age and discretion as to be competent to serve papers, and that on December 8, 2020 he served an electronic copy of the above and foregoing **UNOPPOSED MOTION TO ALLOW TRAVEL** by electronic service (ECF)

/s/ William Brown

Employee of BROWN MISHLER,
PLLC

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7 *Attorney for Defendant*
8 *Pedro Montalvo*

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,

2:20-cr-00156-RFB-DJA

12 Plaintiff,

~~[PROPOSED]~~

13 vs.

ORDER ALLOWING TRAVEL

14 ADALI ARNULFO ESCALANTE-
15 TRUJILLO, et al.,

16 Defendants.

17 Having considered defendant Pedro Montalvo's unopposed motion for
18 travel, it is hereby ordered that the motion is granted, such that Montalvo
19 may travel California for medical treatment on December 14-21, and
20 December 27-28, 2020, and to California for court approved child visitation on
21 the following dates:
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23 1. December 18-21, 2020;

24 2. January 1-4, 2021;

25 3. January 15-8, 2021;

26 4. February 5-8, 2021;

1 5. February 19-22, 2021;

2 6. March 5-8, 2021;

3 7. March 19-22, 2021;

4 8. April 2-5; 2021;

5 9. April 16-19, 2021; and

6 10. April 30 - May 2, 2021.

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9 Dated: December 19, 2020, *nunc pro tunc*
10 Dated December 13, 2020.



11 _____
12 RICHARD F. BOULWARE, II
13 UNITED STATES DISTRICT JUDGE
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